

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**TECHNOLOGY PROPERTIES
LIMITED LLC**

Plaintiff,

v.

CANON, INC., et al.,

Defendants.

Case No. 6:12-cv-202

PATENT CASE

JURY TRIAL DEMANDED

**TECHNOLOGY PROPERTIES LIMITED LLC’S ANSWER TO DEFENDANT
FALCON NORTHWEST COMPUTER SYSTEMS, INC.’S ANSWER, AFFIRMATIVE
DEFENSES, AND COUNTERCLAIMS**

Plaintiff Technology Properties Limited LLC (“TPL”) files this Answer to Defendant Falcon Northwest Computer Systems, Inc.’s (“Defendant”) answer, affirmative defenses, and counterclaims. All of Defendant’s affirmative defenses are denied. Any allegations or affirmative defenses in Defendant’s Answer and Counterclaims not expressly admitted herein are denied.

In response to Defendant’s counterclaims, TPL states as follows:

1. TPL admits the allegations in paragraph 1.
2. TPL admits the allegations in paragraph 2.
3. TPL admits the allegations in paragraph 3.
4. TPL admits the allegations in paragraph 4.

**COUNTERCLAIM FOR A DECLARATION OF NON-INFRINGEMENT OF
UNITED STATES PATENT NOS. 6,796,632, 7162,549, 7,295,443, and 7,522,424**

5. TPL incorporates its responses to paragraphs 1-4 as though fully set forth herein.

TPL denies every averment in Defendant’s Answer and Affirmative Defenses not specifically admitted herein.

6. TPL admits Defendant purports to set forth a counterclaim under the patent laws of the United States (35 U.S.C. §§ 1, et seq.) for a declaration that United States Patent Nos. 6,976,623 (“the ‘623 patent”), 7,162,549 (“the ‘549 patent”), 7,295,443 (“the ‘443 patent”), and 7,522,424 (“the ‘424 patent”), are not infringed by Defendant. TPL denies any remaining allegations contained in Paragraph 6.

7. TPL admits the allegations in paragraph 7.

8. TPL denies the allegations in paragraph 8.

9. TPL denies the allegations in paragraph 9.

**COUNTERCLAIM FOR A DECLARATION OF INVALIDITY
OF UNITED STATES PATENT NO. 6,976,623**

10. TPL incorporates its responses to paragraphs 1-9 as though fully set forth herein.

11. TPL admits Defendant purports to set forth a counterclaim under the patent laws of the United States (35 U.S.C. §§ 1, et seq.) for a declaration that United States Patent No. 6,976,623 ("the '623 patent") is invalid. TPL denies any remaining allegations contained in paragraph 11.

12. TPL admits the allegations in paragraph 12.

13. TPL denies the allegations in paragraph 13.

14. TPL denies the allegations in paragraph 14.

**COUNTERCLAIM FOR A DECLARATION OF INVALIDITY
OF UNITED STATES PATENT NO. 7,162,549**

15. TPL incorporates its responses to paragraphs 1-14 as though fully set forth herein.

16. TPL admits Defendant purports to set forth a counterclaim under the patent laws of the United States (35 U.S.C. §§ 1, et seq.) for a declaration that United States Patent No. 7,162,549 ("the '549 patent") is invalid. TPL denies any remaining allegations contained in paragraph 16.

17. TPL admits the allegations in paragraph 17.

18. TPL denies the allegations in paragraph 18.

19. TPL denies the allegations in paragraph 19.

**COUNTERCLAIM FOR A DECLARATION OF INVALIDITY
OF UNITED STATES PATENT NO. 7,295,443**

20. TPL incorporates its responses to paragraphs 1-19 as though fully set forth herein.

21. TPL admits Defendant purports to set forth a counterclaim under the patent laws of the United States (35 U.S.C. §§ 1, et seq.) for a declaration that United States Patent No. 7,295,443 ("the '443 patent") is invalid. TPL denies any remaining allegations contained in paragraph 21.

22. TPL admits the allegations in paragraph 22.

23. TPL denies the allegations in paragraph 23.

24. TPL denies the allegations in paragraph 24.

**COUNTERCLAIM FOR A DECLARATION OF INVALIDITY
OF UNITED STATES PATENT NO. 7,522,424**

25. TPL incorporates its responses to paragraphs 1-24 as though fully set forth herein.

26. TPL admits Defendant purports to set forth a counterclaim under the patent laws of the United States (35 U.S.C. §§ 1, et seq.) for a declaration that United States Patent No. 7,522,424 ("the '424 patent") is invalid. TPL denies any remaining allegations contained in paragraph 26.

27. TPL admits the allegations in paragraph 27.

28. TPL denies the allegations in paragraph 28.

29. TPL denies the allegations in paragraph 29.

TPL prays for the relief set forth in its Complaint and that Falcon Northwest Computer Systems, Inc.'s Counterclaims and all other relief requested by Defendant be denied.

DATED: February 20, 2014

Respectfully submitted,

THE SIMON LAW FIRM, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all counsel of record this
20th day of February, 2014 via the Court's CM/ECF system.

/s/ Benjamin R. Askew
Benjamin R. Askew